

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION

GREEN DEVELOPMENT, LLC, *et al.*,

Plaintiffs,

v.

TMEIC CORPORATION, *et al.*,

Defendants.

Case No. 7:24-cv-00728-EKD-CKM

**JOINT MOTION FOR ENTRY OF CONSENT ORDER TO STAY DISCOVERY AND
OTHER RELIEF**

Now come the parties, through their respective counsel, and move this Court for entry of the proposed Consent Order appended to this Motion.

After exchanging written requests for discovery, the parties entered discussions to resolve this matter. As part of those efforts, the parties are developing mechanical designs and engineering studies, which are anticipated to take at least eight weeks to complete. This work is to be performed by individual party representatives with primary responsibility to provide information and documents responsive to the outstanding document requests. To accommodate the parties' efforts to resolve this case without further litigation and enable the relevant party representatives to devote their full attention toward a potential resolution, the parties request entry of the accompanying proposed Consent Order, providing for:

- (1) Entry of a stay on all discovery until October 6, 2025;
- (2) An order directing the parties to file with this Court a joint status report on or before September 29, 2025 to provide an update on the status of their efforts to negotiate a settlement and assess whether any extension on the discovery stay is warranted;

- (3) An order directing the parties to respond to outstanding written discovery requests on or before October 20, 2025, unless the stay on discovery is renewed or extended;
- (4) An order extending the deadline to complete fact discovery from November 17, 2025, until January 19, 2026, unless the stay on discovery is renewed or extended;
- (5) An order directing the parties to meet and confer to assess whether additional scheduling dates should be extended; and
- (6) An order directing the parties, if they are unable to resolve this action, to file a joint status report as soon as practicable and attend a scheduling conference with the Court at which the trial commencement date of September 14, 2026 shall be continued by no fewer than eight weeks.

The parties submit that the entry of the proposed Consent Order will facilitate the ongoing settlement discussions and maximize the likelihood that these efforts result in a final resolution of this action.

WHEREFORE, the parties respectfully request that this Court enter the accompanying proposed Consent Order.

Date: August 18, 2025

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document, which was served in its entirety on all counsel of record by the Court's CM/ECF system.

Date: August 18, 2025

/s/ Ian R. Dickinson
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